

Chambers

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DIVISION OF MISSISSIPPI

ANDRE DESHAWN COOLEY,

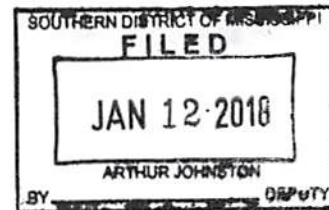
Plaintiff

v.

MISSISSIPPI BOARD OF BAR ADMISSIONS;
WENDY SMITH sued in her individual capacity;
LINDA B. KNIGHT A.K.A. LINDA KNIGHT
sued in her individual capacity; AND
JEFFERY STYRES sued in his individual
capacity

Defendants.

No.



JURY TRIAL DEMANDED

Andre D. Cooley, Plaintiff, Pro se
P.O. Box 18452
Hattiesburg, MS 39404
601-319-5840

MISSISSIPPI BOARD OF BAR ADMISSIONS
450 High Street
Jackson, MS 39201

WENDY SMITH
450 High Street
Jackson, MS 39201

United States Courthouse
501 E. Court Street
Suite 2.500
Jackson, MS 39201

LINDA B. KNIGHT A.K.A. LINDA KNIGHT
450 High Street
Jackson, MS 39201

JEFFERY STYRES
450 High Street
Jackson, MS 39201

Comes Now Plaintiff ANDRE DESHAWN COOLEY in suit, JURY TRIAL DEMANDED for
Deprivation of Plaintiff's Due Process Rights, Discrimination in Violation of Plaintiff's rights
Under the Americans with Disabilities Act, Disparate Impact Discrimination in Violation of
Plaintiff's rights Under the Americans with Disabilities Act, Breach of Contract,

Misrepresentation, Tortious Interference With a Contract and Intentional Infliction of Emotional Distress and does hereby state the following unto this honorable court of law in its request for damages and injunctive relief against any and all defendants:

PARTIES

PLAINTIFF

Plaintiff ANDRE DESHAWN COOLEY is an adult male resident of the State of Mississippi and received his law degree in May 2017 from Western Michigan University Cooley Law School and resides at 28 Sunset Rd Laurel, MS 39440.

DEFENDANTS

1.

Defendant LINDA B. KNIGHT, A.K.A Defendant LINDA KNIGHT is an adult female resident of the state of Mississippi and is currently employed by the Defendant Board of Bar Admissions Knight May be served at her place of employment located at Gartin Justice Building 450 High Street jackson, MS 39201

2.

Defendant WENDY SMITH is an adult female resident of the state of Mississippi and is currently employed by the Defendant Board of Bar Admissions Knight May be served at her place of employment located at Gartin Justice Building 450 High Street jackson, MS 39201

3.

Defendant MISSISSIPPI BOARD OF BAR ADMISSIONS is authorized to determine potential candidates fitness to sit for the bar and to practice law and was at all times acting in its capacity and Board of Bar Admissions for the State of Mississippi and may be served process at Gartin Justice Building 450 High Street Jackson, MS 39201

4.

Defendant JEFFERY STYRES, is an adult male resident of the State of Mississippi, defendant Styres position is chairman of the Board of Bar Admissions, as the order dismissing plaintiff's application dated September 22, 2017 lists Styres as the Board of Bar Admissions chairman, however, the address on the same document says "450 High Street State Street Second Floor Suite 2027 Jackson, Mississippi ," in contrast, the initial letter received by plaintiff dismissing plaintiff's application which was dated June 29 2017 lists the defendants address as 450 High Street," he may be served at Gartin Justice Building 450 High Street Jackson, MS 39201.

COUNT 1

Deprivation of Plaintiff's Due Process Rights; Plaintiff hereby incorporates any and all the preceding and proceeding paragraphs 1-67 in it's complaint for Deprivation of Plaintiff's Due Process Rights.

COUNT 2

Plaintiff hereby incorporates any and all the preceding and proceeding paragraphs 1-67 in it's complaint for Discrimination in Violation of Plaintiff's Rights Under the Americans with Disabilities Act

COUNT 3

Plaintiff hereby incorporates any and all the preceding and proceeding paragraphs 1-67 in it's complaint for Disparate Impact Discrimination in Violation of Plaintiff's Rights Under the Americans with Disabilities Act

COUNT 4

Plaintiff hereby incorporates any and all the preceding and proceeding paragraphs 1-67 in it's complaint for Breach of Contract

COUNT 5

Plaintiff hereby incorporates any and all the preceding and proceeding paragraphs 1-67 in it's complaint for Misrepresentation.

COUNT 6

Plaintiff hereby incorporates any and all the preceding and proceeding paragraphs 1-67 in it's complaint for Tortious Interference With a Contract.

COUNT 7

Plaintiff hereby incorporates any and all the preceding and proceeding paragraphs 1-67 in it's complaint for Intentional Infliction of Emotional Distress.

FACTS

1. Even after plaintiff responded to every request for information by the Board of Bar Admissions, the Board administrators would implement artificial deadlines that were almost impossible for the plaintiff to meet.
2. The plaintiff would respond to the defendant's request with information, however, the board administrators never appeared to want to entertain plaintiff's application to sit for the July 2017 Bar examination. Many of the requests were arbitrary and have no bearing on an applicants ability to sit for the Mississippi Bar Examination.
3. Defendants site lists this among its instructions to bar applicants: "Please read all instructions carefully on our website. It is the applicant's responsibility to make sure his/her application is completed in a timely manner. If an applicant does not complete his/her application within the time period required, his/her application may be dismissed.
4. As part of its accommodations process, the Mississippi Board of Bar Admissions allows applicants to handwrite responses to exam questions, but does not allow applicants to

handwrite responses to questions on the application to sit for the Mississippi bar examination and delays applicant's hand-written responses.

5. Applicants requesting information regarding the Bar Examination are often directed to the <https://courts.ms.gov/baradmissions/baradmissions.html> site, however, the explanations there are not clear and are at times vague.
6. Defendant Board of Bar Admissions never mailed plaintiff a list of subjects tested and other important information used by applicants who have submitted an application and paid the fee to sit for the bar examination.
7. On April 3, 2017 at 5:07 PM Defendant Wendy Smith emailed to plaintiff "Dear Mr. Cooley, I have made several attempts to contact you by phone, but unfortunately was unable to leave a message because your voicemail mailbox is full. We received a Registration As A Law Student Application, along with a \$750.00 certified check, from you today. It is our belief that your intention is to sit for the July 2017 MS Bar Examination. If this is indeed the case, you have submitted the incorrect application, along with the incorrect fee. To sit for the July 2017 MS Bar Exam, you must complete a July 2017 Bar Exam Online Application, print it, and submit to this office with the total fee of \$1050.00 (\$825.00-Exam, \$25.00-Application, & \$200.00-Late Fee).
8. Plaintiff received the following message from defendant Wendy Smith "If you wish to sit for the July 2017 MS Bar Examination, the Board has offered to extend a courtesy to you. You will need to complete the July 2017 Bar Exam Online Application, plus submit an additional \$300.00 (cashier's check or money order), no later than 5:00 p.m., Wednesday, April 5, 2017. If the correct application and fee is not received by the aforementioned deadline, we will

return to you your previously submitted Registration As A Law Student Application and \$750.00 cashier's check. For your convenience, you may use the link below to quickly access the July 2017 Bar Exam Online Application.<https://courts.ms.gov/baradmissions/baradmissionsweb.html>" however, the link did not work and would not allow the plaintiff to access the online application.

9. On April 4, 2017, at 9:50 AM plaintiff emailed Defendant Wendy Smith "Can I have the online application completed and the fee paid by Wednesday ? I'm not currently able to print, but can have the printed application sent by Wednesday."
10. On April 4, 2017 at 11:12 defendant emailed plaintiff "Good morning Mr. Cooley, "The Board has generously extended your deadline to 5:00 p.m. Wednesday, April 5, 2017." On April 4, 2017 defendant emailed plaintiff "Hi Mr. Cooley, Pre-Law Registration is done at the end of your second semester of law school. If you are graduating this year, you won't qualify for Pre-Law Registration, and will need to complete a July 2017 Exam Application as previously mentioned. The deadline for this was Monday, April 3, 2017 (since April 1st fell on a Saturday this year), but as a courtesy, you have until 5:00 p.m. Wednesday, April 5, 2017 to submit the correct application and the addition \$300 to cover the requisite fee."
11. On April 5 2017 plaintiff emailed at 1027 AM requesting access to the online application.
12. On April 5th 2017 at 10:44 AM " Defendant smith emailed plaintiff "Hi Mr. Cooley, Please find attached the application for the July 2017 Bar Exam. If you have any further questions, please feel free to contact me." The file was unformatted and not legible, however the form required responses to be typed.

13. On or about April 5, 2017 filed the late application to sit for the July 2017 Bar exam, and was issued receipt 28154 for fees associated with “Exam” in the amount of 825.00, “Late Fee in the sum of 200.00 and application packed fee of 25.00 from Defendant Wendy Smith After Plaintiff’s application was filed,
14. In Plaintiff’s April 5, 2017 Application to sit for the July 2017 Bar Exam plaintiff requested accommodations under the Americans with Disabilities Act and included a copy of the report from the evaluating doctor for plaintiff’s diagnosis.
15. Defendant’s site suggests “Please read all instructions carefully on our website. It is the applicant’s responsibility to make sure his/her application is completed in a timely manner. If an applicant does not complete his/her application within the time period required, his/her application may be dismissed.
16. As part of its accommodations process, the Mississippi Board of Bar Admissions allows applicants to handwrite responses to exam questions, but does not allow applicants to handwrite responses to questions on the application to sit for the bar examination.
17. Applicants requesting to sit for the Bar Examination are often directed to the <https://courts.ms.gov/baradmissions/baradmissions.html> site, however, the explanations there are not clear and are at times vague.
18. On or about April 27, 2017 Defendant Wendy Smith emailed plaintiff “Dear Mr. Cooley, Attached you’ll find 4 Form 20’s, 2 Form 21’s, 2 Form 22’s and 1 Form 26 that were submitted by you with your July 2017 exam application. All of the attached documents were handwritten. Unfortunately, we are unable to accept handwritten documents. You must type

each and resubmit ASAP.” Smith also attached a copy of the pages with which she had issue, but the pages were legible.

19. On or about April 28, 2017, Defendant Wendy Smith emailed the plaintiff Mr. Cooley, Attached you'll find pages 9-13 of your application. These pages were handwritten. We do not accept handwritten applications. Please type your responses to the corresponding questions on these pages and resubmit to me TODAY via email. For your convenience, you'll also find attached the July 2017 Bar Exam Application. If you have any questions, please feel free to contact me.”

20. On April 28th 2017 at 11:12 AM Defendant Wendy Smith emailed plaintiff “Dear Mr. Cooley, Attached you'll find page 3 of Form 1. You failed to answer question #5. Please answer and submit to me via email today.”

21. On April 28th 2017 Defendant Wendy Smith emailed to plaintiff a status sheet at 1:24

22. On April 28th 2017 at 1:30 PM plaintiff emailed Smith “Should I mail these to you?”

23. On April 28th at 1:40 Smith emailed plaintiff “Hi Mr. Cooley, If you are referring to the handwritten pages of your application that have to be typed, you can either mail them or email them.

24. Plaintiff responded to Smith “Ms. Wendy, per your request I am submitting the additional pages to my application. I also mailed these as I was not sure if the Mac formatting would transfer.” attached to the email were 10 PDF documents, those documents were: (1) Pages 9-17, (2) form 20 – one record of civil action, three 20 – two record of civil action 20 – three record of civil action , 20 – four record of civil action, 21 – one Record of traffic cases, 21 –

two record of traffic cases, 22 – one record of criminal actions, and 22 – two record of criminal actions, form 26 list of creditors.

25. Defendant Wendy Smith responded to the plaintiffs email on May 4 at 9:35 AM “Hi Andre’, Thank you. Also, I received your hard copies in the mail today.”

26. On May 4, 2017 at 2:09 PM defendant Wendy Smith email to plaintiff “ Dear Mr.

Cooley, Please find attached page 2 of your application. Questions #7, 8A and 8B are not answered. You will need to amend your application by submitting a Form 3. On it, please indicate when you intend to take the MPRE, or if you have taken it, please list the date. (#7) (note-MPRE is administered in March, August and November each year) Also, indicate whether or not you will be sitting for the MBE, or if you have previously taken the MBE, please list the date and state where you took it and you will also need to complete a FORM 8A. (#8A) (note-The MBE is administered during the February and July bar exams each year). Lastly, list if you will handwrite or use your laptop during the July 2017 exam.” Please submit this by your May 19, 2017 deadline. If you have any questions, please feel free to contact me. Plaintiff was never made aware of any impending May 19 deadline, Plaintiff’s application was submitted April 5, 2017 and plaintiff received no notice of any deadlines to have documents turned in, nor did plaintiff receive notice via email from any Mississippi Board of Bar Admissions employee concerning any May 19, 2017 deadline.

27. On Tuesday May 16, 2017 plaintiff post-mailed and emailed at defendant Wendy request an amendment to question 8B which indicated that plaintiff will handwrite responses on the state bar examination and that answer was notarized per request of Defendant Wendy Smith, Question 8 A; which indicates that plaintiff will take the Multi-state Bar Examination in

Mississippi during the July 2017 test, and that answer was notarized per request of Defendant Wendy Smith, Form 3, response to question 7 which states that plaintiff has taken the MPRE on March 18, 2017 and the plaintiff's score was a 75, and further that plaintiff as requested the National Counsel of Bar Examiners, (NCBE) transmit the score to the Mississippi, plaintiff also attached a copy of plaintiff's results from the March 18, 2018 MPRE.

28. On May 18, 2017 plaintiff mailed page 3 of form one which asks "did you receive accommodations in law school" plaintiff's answer to this question was yes. Question four asks did you receive accommodations in college (undergraduate or graduate studies)? Plaintiff answered "not requested" Question six asks did you receive accommodations for any of the following standardized tests:" plaintiff's answer to this question was, "no, none."

29. On May 19, 2017 at 12:41PM Defendant Wendy Smith emailed plaintiff an updated form 4 status sheet and an email "ear Mr. Cooley, Please find attached your Form 4 Status Sheet." On Friday May 19, 2017, defendant Wendy Smith emailed to plaintiff, " Hi Mr. Cooley, You will also need to have NCBE send your 3/17 MPRE score to us (Mississippi). You will need to visit the website, select "Score Services", then "MBE Score Services", scroll to the bottom of the page and follow the instructions on "Step 3". If you have any further questions, please don't hesitate to ask."

30. On May 30, 2017 at 10:18 AM "Dear Mr. Cooley, We cannot proceed with your request for accommodations for the July 2017 exam until we receive the following: Form 3 for Test Accommodations, Form 3 to amend your answer to question # 3 on Form 1 , Form 7 for extended time on MPRE"

31. On May 30, 2017 at 11:18 Defendant Wendy Smith emailed plaintiff, "Dear Mr. Cooley, We cannot proceed with your request for accommodations for the July 2017 exam until we receive the following: Form 3 for Test Accommodations, Form 3 to amend your answer to question # 3 on Form 1, Form 7 for extended time on MPRE This must be completed ASAP if you would like accommodations for the July 2017 exam."
32. On May 30 2017 at 12:42 PM plaintiff emailed WS " I sent the paperwork to my evaluator. I do have the report they gave me which has my testing recommendations on it if that will suffice."
33. On May 30, 2017 at 12:44 PM Smith replied "Hi Mr. Cooley, You will need to submit the forms listed in the previous email as soon as possible."
34. On May 30, 2017 at 12:47 plaintiff emailed Defendant Wendy Smith Those forms are with my original application. Can you use those? "
35. On May 30, 2017 at 12:52 The forms listed are missing from your application. Please refer to the status sheet sent to you on 4/28/17 and 5/19/17.
36. On May 30, 2017 at 3:33Ms. Wendy, I am attaching the History form from the law school. Working on everything else."
37. On May 30 at 3:45 PM Smith emailed plaintiff "Thank you Mr. Cooley, however, this has already been submitted. Please submit the missing documents from your Form 4 Status Sheet emailed to you on 5/19/17, along with the missing documents discussed in the email sent to you earlier today."
38. On May 30, 2017 at 8:37 plaintiff emailed Defendant Wendy Smith a response from the national conference of bar examiners in response to plaintiffs request for accommodations on

the August 2016 MPRE, the response details that in NCBE has plaintiff's request for accommodations has been received and that the request will be reviewed, plaintiff also attached an accommodations confirmation from NCB E dated June 6, 2016 which states that the plaintiff was approved for accommodations and outlines the process by which the plaintiff will be admitted to the testing site.

39. On May 31 at 10:48 AM Smith emailed to plaintiff "Dear Mr. Cooley, Please find attached your Form 4 Status Sheet." which indicated the Board of bar examiners had not received plaintiff's ADHD verification, when defendant was in possession of the report issued by plaintiff's evaluator when plaintiff filed the initial application to sit for the July 2017 Bar Examination.

40. At that time Smith advised plaintiff via email that still outstanding were : Certification of Accommodations history, " MPRE and WMU COOLEY" , Certification of Dean of College, and Transcript University of Southern Mississippi, Certification of Dean of College and Transcript Jones County Junior College, Certification of Dean of College, and Transcript from WMU Cooley Law School, Letters of reference, when Each of plaintiff's references will swear under oath that each mailed the completed forms to the Mississippi Board of Bar examiners, Employment verification from Lowe's. FedEx Walmart Forest County Sheriff's Office, Domino's Pizza, Certified Driving record from Mississippi, Defendant hand wrote " you did not answer # 14 b + 16, you MUST amend your application. Submit a Form 3 listing your answers for each, the application does not have a place to type out a response to question 14 B, or Question 16.

41. On Friday June 9, 2016 at 2:11 Defendant Wendy Smith emailed to plaintiff "Dear Mr.

Cooley, Please find attached your Form 4 Status Sheet. Prior to today, a copy of your status sheet was sent to you informing you of your deficient documents on April 28, 2017, May 19, 2017, and May 31, 2017. This is the last correspondence you will receive from me. If all deficient documents are not submitted by Tuesday, June 13, 2017, your application forwarded to the Board for dismissal.

42. On June 9, 2017 at 3:16 PM plaintiff emailed defendant "I've sent and requested the documents, frankly that's all I can do."

43. On June 9, 2017 at 3:19 plaintiff emailed defendant "And giving me a 4 day artificial deadline is unreasonable. I am a person protected by the Americans with Disabilities Act and cannot be treated like everyone else. I have a mental deficiency and that gives me protection under the law from such treatment. Thank you, Andre"

44. On June 16, 2017 plaintiff emailed knight "I was advised recently that all of the requests to each school for information has been submitted to your office."

45. On June 16, 2016 at 7:39 pm plaintiff emailed knight "Attached please find the pleadings for Cooley v. FedEx Freight"

46. On June 19, 2017 Knight emailed plaintiff Mr. Cooley, This will acknowledge receipt of your email below and five pdf documents you provided. As I printed off the copies, I note that 2 of the 5 pdf documents (FedEx Motion and NOTICE ALJ) were not dated when they were signed and does not indicate the date it was filed in court. Have those particular documents been filed, as well as are there any others documents which have been filed in this case?

47. On June 19, 2017 at 5:51 PM knight emailed plaintiff Mr. Cooley, Since Ms. Smith's email to you on June 9 with a copy of the Form 4 – Status Sheet, we have since received a Form 13- Certificate of Dean of College from the University of Southern Mississippi and transcript, as well as the Form 13-Certificate of Dean of College from the Jones County Junior College and transcript. We have not received the following from WMU Thomas M. Cooley School of Law: Completed Form 14 – Certificate of Dean of Law School Law school transcript Copy of the application you submitted when you applied to law school”

48. On June 26, 2017 at 1:06 PM knight emailed Mr. Cooley, This will acknowledge receipt of a copy of the complaint and response for Andre Cooley vs. Forrest County Sheriff's Office. You indicated in your email the case has settled. Since the case has settled, please provide the date of final disposition which should have been included on the attached Form 20.

49. On June 26, 2017 Knight emailed plaintiff “Mr. Cooley, Your typed application was received in this office on 04/05/2017. Item 14a on the July 2017 Bar Examination Application which you submitted states, “YOU MUST INSTRUCT EACH LAW SCHOOL YOU ATTENDED TO MAIL A CERTIFIED COPY OF YOUR TRANSCRIPT AND A COPY OF YOUR LAW SCHOOL APPLICATION DIRECTLY TO THE MBBA OFFICE WITH A COMPLETED FORM 14 ATTACHED.” You may submit a copy of your law school ~~application~~ transcript, however, as instructed in the application, you are required to have the law school send a certified copy of your transcript directly to this office.

50. On June 26, 2017 at 7:57 PM plaintiff emailed defendant “ Ms. Knight, Please find attached my responses in amendment to my Bar application. These are in the mail to you as well.” The attachments include a Form 3 Amended response to question 7 on plaintiff's law school

application and indicates, “ Question 7 on my law school application asks if I have ever had a criminal conviction expunged, I answered “no” because it was a “change” and not a “conviction” I disclosed to the Ms Board of Bar admissions that I had a 2003 charge expunged and not a conviction, I was never convicted of any such charge.

51. Response to question 9 on a Form 3 which indicates that plaintiff does require accommodations

52. Form 3 response to Question 4 where, the Cooley law school application indicates that plaintiff has never been convicted of any driving offense in connection with the consumption of alcohol, plaintiff clarified that the response to NCBE should have been No.

53. Form 3 response to Question 15, which was “NO”

54. Form 3 response to question 22 “no”

55. Form 3 response to question Question 29 was incorrectly answered Yes and plaintiff indicated that the answer should be “no”

56. Form 3 response to question Question 21 on NCBE response “ No”

57. Form 3 response to question Question 6 on Law school application Plaintiff’s amended answer is “No”

58. On July 7, 2017 at 6:58 PM Defendant Linda Knight emailed plaintiff “Dear Mr. Cooley, Please find attached a copy of a cover letter and the Board Order which I received that is being placed in the mail to you today.

59. On July 8th 2017 plaintiff emailed “Ms. Linda, I've worked tirelessly on this process. While I have been granted at least three extensions I do not believe that the boards actions are appropriate. You all have my accommodations request. I have requested all the information be

sent to you all. How do I submit an official request for reconsideration? I'm a person protected under the ADA and I will take whatever action necessary to ensure 1) that I am successful and 2) that I am treated fairly under the law. I have completed law school and have taken the necessary steps to be ready for the bar. Any information that has not been received by your office does not interfere with my ability to sit for the bar examination. You have my background information and educational history, I can still work on the follow up information before I'm granted a license to practice law. Please let me know what I need to do."

60. On July 11, 2017 at 9:54 Ms. Wendy, Since the board dismissed my application when will I receive my money back? "

61. On July 11, 2017 at 10:13 AM Wendy emailed plaintiff Hi Andre, Ms. Knight is out of the office this week and will respond to your request upon her return.

62. On July 18, 2017 at 7:02 plaintiff emailed defendant Linda knight Ms. Knight, Can you tell me how soon the board will be refunding my money for the bar examination? Thank you so much

63. On July 18, 2017 at 7:02 PM Defendant Linda Knight emailed plaintiff " Mr. Cooley, Your request for a refund of fees paid was forwarded to me by Ms. Wendy Smith. I also received your email sent to me this morning. As per Rule III, Section 1, of the Rules Governing Admission to the Mississippi Bar, all fees are non-refundable. Section 1. Application Forms. Law student applications, examination applications and all other forms used in the admissions process shall be in a form approved by the Board. There shall be a fee of \$25.00 for the official application forms (money order, certified check or cash only). Applications are available on-line at www.courts.ms.gov/baradmissions. No application shall be accepted

which is not filed on official forms and which is not accompanied by the full amount of fees due. Payment of fees shall be made to "Board of Bar Admissions". (Money order, certified check or cash only). ALL FEES AND OTHER MONIES PAID TO THE BOARD ARE NOT REFUNDABLE IN WHOLE OR IN PART.

64. In accordance with the rule cited above, typically, application fees are not returnable nor refundable; however, should you desire to file a petition with the Board requesting to voluntarily withdraw your application and request a reimbursement of your application fee, I will submit your petition and request to the Board for their review and consideration. Since the July 2017 Bar Examination is being administered next week, I would not expect the Board being able to reply to any petition you might decide to submit until after August 1st."

65. On September 26, 2017 at 5:43 PM, Defendant Linda Knight emailed plaintiff Mr. Cooley, A check refunding your fees was mailed to you on October 22 to the mailing address you previously provided to us - P.O. Box 18452, Hattiesburg, MS 39404." The letter and order was signed by defendant Styres.

66. On October 23, 2017 at 9:41 PM Defendant Linda Knight emailed plaintiff " Mr. Cooley, It has come to my attention that the email below contained an incorrect date as to the date on the cover letter which accompanied the Board Order approving a refund of your fees and the refund check in the amount of \$1,050.00. Please find attached a corrected letter. Also included is a copy of the Board Order and refund check which would have been mailed to you on September 22. The letter and order was signed by defendant Styres.

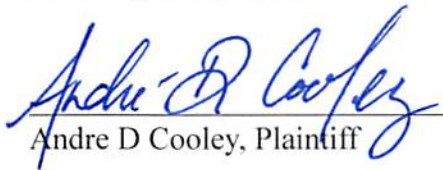
67. On October 24, 2017 Plaintiff emailed defendant at 1:57 Ms. Knight, I have requested that the United States Department of Justice investigate the Mississippi Board of Bar Examiner's


handling of and subsequent dismissal of my application to sit for the July 2017 Bar Examination. Pending their determination and choice to assist me with this legal matter I will be taking legal action against the Board and any person who obstructed my opportunity to sit for the exam, which was inconsistent with the Americans with Disabilities Act of 1990. Please save all documents concerning me. Also, I never received my application or its attachments back. Could you please check into the status of that request for me? Thank you so much for your time and attention with this matter. Sincerely, I am, Andre D. Cooley”

PRAYER FOR RELIEF

Plaintiff respectfully prays for actual, punitive and compensatory damages against any and all defendants for Deprivation of Plaintiff’s Due Process Rights, Discrimination in Violation of Plaintiff’s Rights Under the Americans with Disabilities Act, Disparate Impact Discrimination in Violation of Plaintiff’s Rights Under the Americans with Disabilities Act, Breach of Contract, Misrepresentation, Tortious Interference With a Contract and Intentional Infliction of Emotional Distress against any and all defendants, and request any and all other relief this court deems just, necessary and proper.

Respectfully submitted,


Andre D Cooley, Plaintiff


Date

PROOF OF SERVICE

I Andre D. Cooley mailed the attached suit to the defendants.

P.O. Box 18452
Hattiesburg, MS 39404
601-319-5840

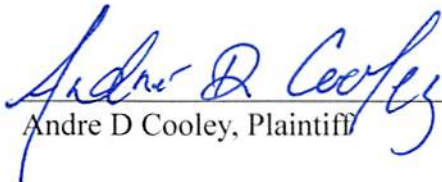
MISSISSIPPI BOARD OF BAR ADMISSIONS
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United States Courthouse
501 E. Court Street
Suite 2.500
Jackson, MS 39201

LINDA B. KNIGHT A.K.A. LINDA KNIGHT
450 High Street
Jackson, MS 39201

JEFFERY STYRES
450 High Street
Jackson, MS 39201


Andre D Cooley, Plaintiff


Date